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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

THIS DOCUMENT RELATES TO:

*Irvington Public Schools v. Meta
Platforms Inc., et al.*

Case No. 4:23-cv-01467-YGR

MDL No. 304

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF MICHAEL A. INNES
IN SUPPORT OF IRVINGTON PUBLIC
SCHOOLS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT (SD MSJ No.4)**

Judge: Hon Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1 4th Floor

Michael A. Innes, declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted to practice law in the states of New York and New Jersey. I am a partner with Carella, Byrne, Cecchi, Brody & Agnello, P.C., counsel for the Plaintiff Irvington Public Schools ("IPS"). I have personal knowledge of the facts stated in this Declaration, and if called upon to do so, could and would competently testify thereto.

2. I submit this Declaration in support of Irvington Public Schools' Opposition to Defendants' Motion for Summary Judgment (Irvington) (SD MSJ No. 4) ("Motion"), filed

1 concurrently with this Declaration.

2 3. Attached as Exhibit 1 is a true and correct copy of Plaintiff Irvington Public School's
3 Supplemental Plaintiff Fact Sheet, ("SPFS"), which was certified on May 31, 2024.

4 4. Attached as Exhibits 2 A and B are true and correct copies of transcripts of the
5 depositions of Dr. April Vauss in this action, which took place as follows: A. 30(b)(1) dated May
6 6, 2025, and B. 30(b)(1) dated May 9, 2025.

7 5. Attached as Exhibit 3 is the true and correct copy of the transcript of the 30(b)(6)
8 deposition of Dr. April Vauss in this action, which took place on May 16, 2025.

9 6. Attached as Exhibit 4 is a true and correct copy of the transcript of the 30(b)(1)
10 deposition of Michael Bussacco in this action, which took place on May 1, 2025.

11 7. Attached as Exhibit 5 is a true and correct copy of the transcript of the 30(b)(1)
12 deposition of Dr. Kcyied Zahir in this action, which took place on May 20, 2025.

13 8. Attached as Exhibit 6 is a true and correct copy of the transcript of the 30(b)(1)
14 deposition of John Amberg in this action, which took place on May 14, 2025.

15 9. Attached as Exhibit 7 is a true and correct copy of the transcript of the 30(b)(1)
16 deposition of Darnel R. Mangan in this action, which took place on May 21, 2025.

17 10. Attached as Exhibit 8 A is a true and correct copy of the transcript of the 30(b)(6)
18 deposition of Dr. Shelley Pettiford in this action, which took place on May 13, 2025.

19 11. Attached as Exhibit 9 is a true and correct copy of the transcript of the 30(b)(1)
20 deposition of Dr. Shelley Pettiford in this action, which took place on May 15, 2025

21 12. Attached as Exhibit 10 is a true and correct copy of the Affidavit of Sandra Lopez,
22 which was served in this action on May 16, 2025.

23 13. Attached as Exhibit 11 is a true and correct copy of the Declaration of Dr. April
24 Vauss, which was submitted May 13, 2025.

25 14. Attached as Exhibit 12 is a true and correct copy of the Amended Expert Report of
26 Dr. Sharon Hoover in this action, which was served on June 20, 2025.

1 15. Attached as Exhibit 13 is a true and correct copy of the Amended Rebuttal Report of
2 Dr. Sharon Hoover in this action, which was served on August 7, 2025.

3 16. Exhibit 14 has been intentionally omitted.

4 17. Attached as Exhibit 15 is a true and correct copy of Pew Research Center, *Roughly a*
5 *Quarter of Black and Hispanic Teens Report Using TikTok, YouTube Almost Constantly*, (Dec. 12,
6 2024), [https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-](https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-2024/pi_2024-12-12_teens-social-media-tech_0-05/)
7 [2024/pi_2024-12-12_teens-social-media-tech_0-05/](https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-2024/pi_2024-12-12_teens-social-media-tech_0-05/).

8 18. Exhibit 16 has been intentionally omitted.

9 19. Attached as Exhibit 17 is an excerpt from a spreadsheet, bearing the Bates number
10 TIKTOK3047MDL-297-04896790, produced by Defendant TikTok.

11 20. Attached as Exhibit 18 is a an excerpt from a spreadsheet, bearing the Bates number
12 TIKTOK3047MDL-297-04896791, produced by Defendant TikTok.

13 21. Attached as Exhibit 19 is an excerpt from a spreadsheet, bearing the Bates number
14 SNAP5288219, produced by Defendant Snap.

15 22. Exhibit 20 has been intentionally omitted.

16 23. Exhibit 21 has been intentionally omitted.

17 24. Attached as Exhibit 22 is a true and correct copy of New Jersey School
18 Performance Report, Irvington Public School District, 2023-2024,
19 [https://www.nj.gov/education/spr/landing.shtml?county=13&district=2330&school=090&schooln](https://www.nj.gov/education/spr/landing.shtml?county=13&district=2330&school=090&schoolname=Chancellor%20Avenue%20Elementary%20School&schoolYear=202324&viewType=district&districtname=Irvington%20Public%20School%20District&rptType_d=7)
20 [ame=Chancellor%20Avenue%20Elementary%20School&schoolYear=202324&viewType=distric](https://www.nj.gov/education/spr/landing.shtml?county=13&district=2330&school=090&schoolname=Chancellor%20Avenue%20Elementary%20School&schoolYear=202324&viewType=district&districtname=Irvington%20Public%20School%20District&rptType_d=7)
21 [t&districtname=Irvington%20Public%20School%20District&rptType_d=7](https://www.nj.gov/education/spr/landing.shtml?county=13&district=2330&school=090&schoolname=Chancellor%20Avenue%20Elementary%20School&schoolYear=202324&viewType=district&districtname=Irvington%20Public%20School%20District&rptType_d=7)

22 25. Exhibit 23 has been intentionally omitted.

23 26. Exhibit 24 has been intentionally omitted.

24 27. Exhibit 25 has been intentionally omitted.

25 28. Attached as Exhibit 26 is a true and correct copy of the Expert Report of Seth Noar
26 in this action, which was served on May 16, 2025.

1 29. Attached as Exhibit 27 is a true and correct copy of the New Jersey Department of
2 Education *2020 New Jersey Student Learning Standards – Career Readiness, Life Literacies, and*
3 *Key Skills Introduction* (June 2020).

4 30. Attached as Exhibit 28 is a true and correct copy of the Declaration of Dr. April
5 Vauss, which was submitted on November 3, 2025.

6 31. Attached as Exhibit 29 is a true and correct copy of Plaintiff's Third Amended
7 Answers to Defendants' Interrogatories to Irvington Public Schools (Set 3), served May 14, 2025.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct.

10
11 Executed on: November 7, 2025

12 /s/ Michael A. Innes
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